

National Aeronautics and
Space Administration
John C. Stennis Space Center
Stennis Space Center, MS 39529-6000



June 4, 2012

Reply to the Attn: Office of Chief Counsel

TO: Distribution

FROM: Attorney Advisor

SUBJECT: Determination Regarding Attendance by NASA Employees at Federal, Aerospace and Defense Cocktail Reception hosted by Parametric Technology Corporation (PTC)

In accordance with 5 C.F.R. 2635.204(g)(2)&(3), and 14 C.F.R. §1207.103, Designation of Responsible Officials, I make the following determination:

NASA personnel may attend the Federal, Aerospace and Defense Cocktail Reception to be held at Rosen Shingle Creek, Orlando, FL, on Tuesday, June 5, 2012, from 5:30 to 7:30 p.m.

The reception is to be hosted by Parametric Technology Corporation (PTC) in conjunction with its PlanetPTC Live 2012 Conference and will be attended by approximately 200 representatives of government and the aerospace industry. The cost of each individual's attendance, which includes light refreshments, is expected to have a market value of \$335 or less.

In light of the following, I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 635.204(g)(2). I further determine that there is an Agency interest in attendance by NASA personnel. That interest includes the opportunity to disseminate information about NASA and to gain insight into the operations, concerns, and opinions of other actors in the field of aerospace. Accordingly, NASA employees whose duties do not substantially affect PTC may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect PTC, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Sincerely,

A handwritten signature in cursive script, appearing to read "Meredith Blasingame".

Meredith Blasingame
Attorney, Stennis Space Center Office of the Chief Counsel